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June 15, 2023

## VIA EMAIL AND ECF

Honorable Sean H. Lane United States Bankruptcy Judge United States Bankruptcy Court 300 Quarropas Street White Plains, New York 10706

RE: In re WB Bridge Hotel LLC, and 159 Broadway Member, LLC,

Case No. 20-23288 and 20-23289 (SHL);

Wasserstein, as Trustee of WB Bridge Creditor Trust ("Liquidating Trustee") v. 11 Apple LLC, et al., Adv. Pro. No. 22-07059 (SHL)

## Dear Judge Lane:

We represent certain of the defendants ("Defendants") in the above-referenced adversary proceeding. As Your Honor may recall, currently pending before the Court is the Liquidating Trustee's motion to disqualify Leech Tishman Robinson Brog, PLLC ("Leech Tishman") as counsel to Defendants and Leech Tishman's motion to withdraw as counsel to the Debtors. After our last submission on May 2, 2023, we recently became aware of the case Alan N. Halperin, as Liquidating Trustee of the High Ridge Brands Co. Liquidating Trust v. Arawak IX, L.P., et al. (In re HRB Windown, Inc., et al.), Case No. 19-1269 (BLS), Adv. Pro No. 21-51412 (BLS) (Bankr. D. Del. May 5, 2023), a copy of which is attached hereto. As we believe this case is relevant to the issues before the Court on the Liquidating Trustee's motion to disqualify our firm, we felt obligated to bring it to the Court's attention.

Respectfully submitted,

/s/Steven B. Eichel Steven B. Eichel

SBE:tef
Enclosures
cc: David Mahoney, Esq.
Andrea Schwartz, Esq.

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